



Great Public Schools  
for Every Child

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January 26, 2009

American Psychological Association  
750 First Street, NE  
Washington, D.C. 20002-4242

Dear Members of the Board of Educational Affairs and Model Licensure Act Task Force:

I am writing to you as President of the National Education Association, the nation's largest professional employee organization. NEA is committed to advancing the cause of public education. Our members work at every level of education: from pre-school to university graduate programs. The Association has affiliate organizations in every state and in more than 14,000 communities across the United States. On behalf of the NEA's 3.2 million members, we urge you to continue the exemption for school psychologists, which is set forth in APA's Model Act.

**First**, the exemption, which has been in place for over 30 years, reflects the right of our school psychologist members who are certified by their state education agencies to use the term "psychologist." In this regard, the title "school psychologist" accurately describes the level of training and supervised field-based experiences that school psychologists are required to achieve as they work to improve the outcomes for children, families and schools.

**Second**, school psychologists play a critical role in schools by assisting teachers in addressing academic, behavioral, and social needs of students. In addition, these individuals are important members of the IEP, evaluation and other school teams, working directly with students and providing consulting services to school staff. Due to recent changes in the Individuals with Disabilities Education Act and implementing regulations, school psychologists also are increasingly playing an important role in the "response to intervention" process, a new early intervening approach aimed at identifying and addressing learning needs of students before they have been identified for special education services.

**Third**, school psychologists have had unique and extensive training concerning the special learning, behavioral, and mental health needs of elementary and secondary school students. This training specifically focuses upon issues that are critically important in schools: special education; crisis prevention and intervention; instruction; classroom management; learning and behavior; and mental health.

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**Fourth**, with regard to behavioral and mental health services, school psychologists are specifically trained to provide interventions when students are violent and disruptive. Such interventions can include behavioral assessment and development or revision of behavior plans, implementation of such plans, counseling, consultation with staff and parents, case management, progress monitoring, and crisis prevention. Mental health is essential to success in school and in life and schools need school psychologists in order to meet the growing needs of students in this area.

**Fifth**, in contrast to the benefits, which support a continuation of the exemption, it does not appear that withdrawal of the exemption would provide any benefits. In fact, such a withdrawal would likely harm students, families and schools by exacerbating an already severe shortage of school psychologists particularly in a number of rural and urban districts. These shortages have had a significant impact upon minority students, those who have Limited English Proficiency (LEP), and LEP students who are also eligible for special education. Any change that makes it even more difficult for these students to access school psychologist services will not serve the public interest and will likely harm students who are most vulnerable to school failure and to those mental health problems that have a negative impact upon success in school.

**Sixth**, state standards are already in place, which ensure that school psychologists are well trained. These standards are based upon recommendations of established, reputable, professional organizations such as the National Association of School Psychologists, the National Association of State Directors of Teacher Education and Certification, and the National Council on Accreditation of Teachers. By incorporating these recommendations, state education agencies have fulfilled their duty to ensure that school psychologists have the training needed to address the specific learning, behavioral, and mental health needs of students in elementary and secondary schools.

For the reasons detailed above, the National Education Association urges the Task Force to continue the exemption for school psychologists in the APA Model Licensure Act. Thank you for considering our comments.

Sincerely,



Dennis Van Roekel  
President